

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

v.

ANGELA M. BLYTHE,

Defendant.

Case No. 1:14-cr-00591-WDQ

MOTION TO STAY IMPRISONMENT PENDING APPEAL

Defendant Angela M. Blythe, by and through her undersigned counsel, and pursuant to Fed. R. Crim. P. 38, hereby moves the Court to stay her imprisonment pending the resolution of her appeal of the Court's final judgment entered on December 16, 2015. A memorandum of points and authorities in support of this motion and proposed order are filed herewith.

Dated: February 4, 2016

Respectfully submitted,

/s/

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